

LAW OFFICE OF SCOTT J GOLDSTEIN LLC

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Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
NEWARKVICINAGE**

In re

LAWRENCE KALISH AND HOPE
KALISH

Chapter 13 Debtors

Case No. 20-22303

Chapter 13

Honorable John K. Sherwood

Marie-Ann Greenberg, Chapter 13 Trustee	Lawrence Kalish of 17 Felter Place, Lake Hopatcong, NJ 07849 and Hope Kalish	Office of the US Trustee 1085 Raymond Blvd, Ste 2100 Newark, NJ 07102
All creditors		

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on the 22nd day of April, 2021, at 10:00 am, or as soon thereafter as counsel may be heard, the Debtor(s), by and through the undersigned attorneys, Scott J. Goldstein and Law Office of Scott J Goldstein LLC shall move before the Honorable Honorable John K. Sherwood, for the entry of an Order pursuant to 11 U.S.C. §363(f) approving the sale of the debtors' interest in certain real property free and clear of any liens.

The debtors have filed papers with the court to approve the sale of Hope Kalish's interest in real property located at 290 Changebridge Road, Pine Brook, New Jersey.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the requested relief, or if you want the court to consider your views on the motion, within seven (7) days of the scheduled hearing , you or your attorney must:

File with the court a written response in opposition to the motion explaining your position to:
Clerk

United States Bankruptcy Court
50 Walnut Street
Newark, NJ 07102

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Scott J. Goldstein Law Office of Scott J Goldstein LLC 280 West Main Street Denville, NJ 07834	Marie-Ann Greenberg, Chapter 13 Trustee 30 Two Bridges Road, Ste 330 Fairfield, NJ 07004
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IF YOU OPPOSE THE RELIEF REQUESTED, YOU SHOULD ATTEND THE SCHEDULED HEARING AT THE TIME AND DATE ABOVE AT:

United States Bankruptcy Court
50 Walnut Street
Newark, NJ 07102

PLEASE TAKE FURTHER NOTICE, that Oral Argument is not requested pursuant to D.N.J. LBR 9013-1(f) unless this motion is contested. Pursuant to D.N.J. LBR 9013-1(d) if you wish to oppose or contest the motion, you must file with the office of the Clerk of the Bankruptcy Court, responding papers stating, with particularity, the basis of your opposition to the within motion. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief

PLEASE TAKE NOTICE that, pursuant to D.N.J. LBR 9013-1(a)(4), a proposed order setting forth the relief requested is being filed contemporaneously herewith.

Dated: 3/23/2021

LAW OFFICE OF SCOTT J GOLDSTEIN LLC

By: /s/Scott J. Goldstein 016472004
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